

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO**

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MELODY JOY CANTU AND DR. RODRIGO  
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL  
FORENSICS CORPORATION, LLC,

Defendants.

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**Plaintiff's Initial Disclosures  
Pursuant to Rule 26(a)(1) of  
the Federal Rules of Civil  
Procedure**

Under Fed. R. Civ. P. Rule 26(a)(1), Plaintiffs Melody Joy Cantu and Dr. Rodrigo David Cantu (“Cantus”) hereby make their initial disclosures. The initial disclosures are made without the benefit of any discovery. Plaintiffs reserve the right to amend their disclosures to add additional witnesses, documents, or computation of damages calculations as a result of discovery or other factors. The Cantus reserve the right to amend, revise, or supplement these disclosures in supplemental disclosures served under Fed. R. Civ. P. Rules 26(a)(1) or 26(e)(1), in written discovery responses, in deposition testimony, or by any other means as the case progresses.

### 1. List of Witnesses

Name of Person	Person’s Address and Telephone Number	Description of what the person knows
Melody Joy Cantu	(210) 414-0409; 128 Spring Hill Dr, Boerne, TX 78006	Co-Plaintiff in the case.
Rodrigo David Cantu	(210) 425-5765; 128 Spring Hill Dr, Boerne, TX 78006	Co-Plaintiff in the case.
Dottie Laster	(210) 882-2259	Private Investigator hired by Cantus for the criminal matter against Melody Cantu.
Kristina Prewit	(877) 445-5362; 100 NE Loop 410 STE 540, San Antonio, TX 78216	Forensic expert for ExhibitA, which the Cantus hired.
Sheri Makowski	(239) 645-8465; Lehigh Acres, Florida 33936	Forensic expert for KIP & Associates which the Cantus hired.
Dr. Sandra Guerra	410 E Rosewood Ave, San Antonio, TX 78212	Co-Defendant was deposed in a previous civil matter with Plaintiffs, and provided a Phase I report from Digital Forensics Corporation, LLC.
Digital Forensics Corporation, LLC	(833) 230-9341, (844) 390-2818; 1100 NW Loop 410 #700, San Antonio, TX 78213	Co-Defendant

Jackie Johnston	(210) 367-4641; 1130 Summit Crst, San Antonio, TX, 78258	Friend of Plaintiff and knew background on the case.
Mindy Holeman	(503) 754-5884; 732 June Dr, Molalla, OR, 97038	Melody Joy Cantu's half-sister helped Melody dealing with all issues stemming from the criminal and civil matters.
Dale Hammerschmidt	(254) 781-1679; 720 Morningside Dr, Nolanville, TX, 76559	Friend of Melody Joy Cantu, witness to Cantus' trauma caused by Defendants.
Danielle Wollervweron	(830) 992-1438; 2020 Briarwood Cir, Fredericksburg, TX 78624	Friend of Cantus, witness to Cantus' trauma caused by Defendants.
Rene Charles	(281) 384-0407; 18519 W Laura Shore Dr, Cypress, TX 77433	Friend of Cantus, witness to Cantus' trauma caused by Defendants.
Dr. John Seals	(210) 615-2222; 4410 Medical Dr #240; San Antonio, TX 78229	Melody Joy Cantu's neuropsychologist with information on trauma and stress caused by Defendants, as well as helped Melody's children with trauma.
Steve Cervantes	(210) 341-3525; 325 E Sonterra, San Antonio, TX 78258	Dr. Rodrigo David Cantu's therapist from 2017.
Randolph A. Pollock, MA, LPC	(210) 558-8200; 11118 Wurzbach, Suite 207, San Antonio, TX 78230	Melody Joy Cantu's therapist for panic and anxiety.
Sameer Kinra	(713) 824-1342; 5624 Signal Point, Austin, TX 78724	Melody Joy Cantu's friend who was with her when contacting Spectrum regarding the cable router.
Janet Betts	011441565653711; 88 London Road, Crewe, England, CW4 7BD, UK	Melody Joy Cantu's friend Cantus' trauma caused by Defendants.
Lorena M. Hernandez	Information not available.	Has information regarding the timeline of events of when the Cantus reconciled and who knew.
Keira Schwartz Dux	(832) 795-2542; 6705 Cambian Pine, Las Vegas, NV 89140	Lived with Melody Joy Cantu after her arrest and witnessed trauma to Cantus, as well as the issues involved with the criminal case.

Edwardo Gallardo	Detective at Prue Road Sub Station.	Detective that charged Melody Joy Cantu in the criminal case.
Sergeant Sergio Flores	Detective at the Downtown San Antonio Police Department Special Victims Unit.	Detective interviewed Dr. Guerra regarding the criminal case filed by Melody Joy Cantu.
Dr. Joann Murphy	(210) 495- 0221; 1202 W Bitters Rd #3, San Antonio, TX, 78216	Forensic Phycologist consulted Cantus after Melody's arrest.
Deena Trevino	(210) 647- 7712; 7272 Wurzbach Rd #1504, San Antonio, TX 78240	Court appointed therapist in their civil case.
Christine Hefel	(210) 698-8818; 23535 I-10 #2204 San Antonio, TX 78257	Provided therapy to Dr. Rodrigo Cantu's daughters.

## 2. Category

<b>Category of Document, Electronically Stored Information, Item, or Tangible Thing</b>	<b>Location of Document, Electronically Stored Information, Item, or Tangible Thing</b>
Exhibit A Forensic Report for Cantus	Box and/or Logikcull
KIP & Associates Forensic Report for Cantus	Box and/or Logikcull
Digital Forensics Phase I Report for Dr. Guerra by DFC LLC.	Box and/or Logikcull
Photos and phone calls relating to the cable box splitter	Box and/or Logikcull
Receipts for costs listed below	Box and/or Logikcull
Phone call with Spectrum regarding the cable splitter	Box and/or Logikcull
Screenshots of suspicious computer and phone activity	Box and/or Logikcull

## 3. Plaintiffs/Claimants: Damages Calculation

<b>Nature of Cost</b>	<b>Amount Owed</b>	<b>Injuries Suffered</b>
Monthly Management and Security of the	\$1,407.12	As a result of Defendants' conduct, accessing the Cantus' protected computers without

Router to CDR Business IT Solutions, LLC.		authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data, the Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Router Replacement to CDR Business IT Solutions, LLC.	\$660.00	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Retainer Funds for Digital Investigation	\$5,000	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus'

		computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Consultation Meeting with Exhibit A Computer Forensics	\$237.38	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Monthly Data Storage by Exhibit A Computer Forensics	\$865.92	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in

		expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Internal Hardrive for Exhibit A Computer Forensics	\$216.50	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Forensic Analysis for 2 Reports by Exhibit A Computer Forensics	\$1,034.25	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.



Dark Web Live Email Scan by Exhibit A Computer Forensics	\$274.89	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Router Monitoring Subscription by CDR Business Solutions	\$216.48	As a result of Defendants' conduct, accessing the Cantus' protected computers without authorization, thereby obtaining private information. The damage includes impairment to the integrity and availability of the Cantus' data, programs, systems, and information on the Cantus' computers and networks resulting from computer crashes, diminished bandwidth, diminished processing time, and the deletion and alteration of data. The Cantus suffered loss in expending time, money, and resources to investigate the intrusion, assess the damage, and restore their systems to their prior state.
Attorney's Fees for the Criminal Matter	\$25,000	As a result of the malicious prosecution, Plaintiff Melody Cantu suffered loss in paying attorney's fees for representation in the criminal matter.

Bond Fee for the Criminal Matter	\$80.00	As a result of the malicious prosecution, Plaintiff Melody Cantu suffered loss in paying for bond in the criminal matter.
Attorney's Fees for the CPS Investigation	\$3,500	As a result of the false CPS Investigation filed by Dr. Sandra Guerra, Cantus suffered loss in paying for attorney's fees to resolve the situation.
Dr. Seals	Melody Joy Cantu - \$2762.12 Dr. Rodrigo David Cantu- \$600 William Stuart Ross \$2334.77 Madeleine Joy Ross- \$2495.29	As a result of the trauma to Cantus and their family caused by Defendants' actions, Cantus and Melody's children much emotional stress- necessitating therapy.
Randolf Pollock	Madeleine Joy Ross - \$1479.16 William Stuart Ross \$ 791.66 Lilian Grace Ross - \$416.66	As a result of the trauma to Cantus and their family caused by Defendants' actions, Cantus and Melody's children much emotional stress- necessitating therapy.
Steve Cervantes	\$2600	As a result of the trauma to Cantus and their family caused by Defendants' actions, Dr. Cantu required therapy.
Hawk Security	\$1,800	As a result of Defendants' conduct, the Cantus feared for their safety, and suffered loss in paying for security cameras.
Fees, Taxes, and Penalties	Approximately \$50,000	As a result of Defendants' conduct, Plaintiffs suffered loss in fees, taxes, and penalties for withdrawing money from their retirement funds in order to pay their attorney's fees.

**CERTIFICATE OF SERVICE**

Case name: Melody Joy Cantu et al v. Dr. Sandra Guerra et al.

Case number: 5:20-CV-0746 JKP – HJB

On December 1, 2020, I Nicole Guitelman personally emailed opposing counsel, in the aforementioned matter, Plaintiffs' Initial Disclosures.

To: [jerry.rios@harleylawgroup.com](mailto:jerry.rios@harleylawgroup.com); [lewis.harley@harleylawgroup.com](mailto:lewis.harley@harleylawgroup.com); [bpeery@lawdcm.com](mailto:bpeery@lawdcm.com); [lstrieber@lawdcm.com](mailto:lstrieber@lawdcm.com); [rcedillo@lawdcm.com](mailto:rcedillo@lawdcm.com).

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Respectfully submitted,

/s/ Tor Ekeland

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